

Chloe Baker
ChloeMBaker2014@gmail.com
(713) 775-3077

September 25, 2022

Via Mail and Electronic Mail (Melissa Morgan@txs.uscourts.gov)

The Honorable Christina A. Bryan
United States District Courts
515 Rusk St.
Houston, Tx 77002
ATTN: Ms. Melissa Morgan, Case Manager

Re: Response to Defendant's Request for Bill of Costs in Baker vs. Lone Star Legal

Aid, Civil Case No. 4:20-cv-03870

To the Honorable Judge Bryan:

I am seeking a reduction or denial of Defendant's request for bill of costs.

FACTUAL BACKGROUND

In February of 2022, former attorney to Plaintiff, Kendrick Bradley, conducted 2 depositions in connection with the case Baker vs. Lone Star Legal Aid, Civil Case No. 4:20-cv-03870.

Kendrick Bradley was tardy for both depositions and was told by Defendants if he were to be late for the third deposition, they would leave and request attorney fees as a retaliation. There is no record of a third deposition and Defendants are seeking \$6,010 in attorney fees.

Plaintiff has filed a complaint on Kendrick Bradley for neglect of case.

The Honorable Christina A. Bryan

BASIS FOR DENIAL/REDUCTION REQUEST

It is clear that the reasoning for bill of costs being filed is a response to Kendrick Bradley's tardiness. (Exhibit A)

The responsibility should not fall on Plaintiff nor should Plaintiff be punished for utilizing the court of law and seeking resolution to claims against Defendant.

Plaintiff is currently a disabled veteran on a fixed income who has not worked since being terminated from Lone Star Legal Aid. (Exhibit B) Plaintiff is pursuing a degree as a full-time student also transitioning to a new state for a fresh start. Being held responsible for the actions of another would financially ruin Plaintiff

Please consider dismissal or lowering final judgement amount as it relates to bill of costs sought out by Defendant.

CONCLUSION

It is my request that the Court denies permission to Defendants to place burden of bill of costs on Plaintiff.

Respectfully,

/s/Chloe Baker

Chloe Baker

The Honorable Christina A. Bryan

CERTIFICATE OF SERVICE

cc- via mail delivery and electronic

mail:

Ms. Melissa Morgan

Case Manager

United States District Courts

515 Rusk St., 7 th floor, Room 7019

Houston, Texas 77002

Telephone: (713) 250-5703

E-mail: Melissa_Morgan@txs.uscourts.gov

Vinson & Elkins, LLP

1001 Fannin Street, Suite 2500

Houston, Texas 77002

E-mail:

The Honorable Christina A. Bryan

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

CHLOE BAKER,

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CIVIL ACTION 4:20-CV-03870V.

LONESTAR LEGAL AID,
ERNEST BROWN, PAMELA SOTOODEH
SONIA LOPEZ, COURTNEY PAULDING
AND ANNA MARTINEZ

VIDEO DEPOSITION TRANSCRIPT

01:29:13

TIMESTAMPED REFERENCE UNOFFICIAL TRANSCRIPT
OF SONIA LOPEZ

- 1 00:00:01.860 --> 00:00:02.580 (mario)Legally Under Oath: We're now recording.
- 2 00:00:21.690 --> 00:00:36.390 (mario)Legally Under Oath: Alright, good morning,
everybody, we are now on the rec-- we are now on the record for the non-stenographic
video deposition of Sonia Lopez, the time is 10:35am today's date is Thursday
February 10, 2022.
- 3 00:00:38.460 --> 00:00:48.900 (mario)Legally Under Oath: This is the case of Chloe
Baker versus Lonestar Legal Aid and others case number is 420-CV-03870.
- 4 00:00:49.740 --> 00:01:01.680 (mario)Legally Under Oath: In the United States
district court for the southern district court for the southern Texas, Houston Division,
my name is Mario Villareal and I'm a registered online notary with the State of Texas,
and the deposition videographer for today's deposition.
- 5 00:01:03.840 --> 00:01:04.890 (mario)Legally Under Oath: Objections by the rules.
- 6 00:01:08.700 --> 00:01:09.060 K. E. Bradley Law: Yes.

649 01:23:25.350 --> 01:23:40.770 K. E. Bradley Law: When it comes to these worker agreements you didn't have any again and I'm going back to this part, did you feel like because of her formal complaint that she probably wouldn't be kept on any longer.

650 01:23:44.190 --> 01:23:44.430 Sonia Lopez - Lonestar Legal Aid: No.

651 01:23:46.740 --> 01:23:58.200 K. E. Bradley Law: You didn't think that that would play a role as to whether they would find another I guess grant to move her to- to continue her employment at that point, you did you have no insight on that.

652 01:23:58.800 --> 01:23:59.490 Sonia Lopez - Lonestar Legal Aid: No, I did not.

653 01:24:55.710 --> 01:24:58.890 K. E. Bradley Law: I think I'll wrap up in the next 10 once we come back.

654 01:25:01.200 --> 01:25:01.950 K. E. Bradley Law: That would work?

655 01:25:04.740 --> 01:25:06.900 (mario)Legally Under Oath: Sorry I'm probably on mute, the time is

656 01:25:07.050 --> 01:25:09.450 Chris Bacon: Excuse me, excuse me can we keep on going.

657 01:25:09.480 --> 01:25:11.820 Chris Bacon: You started this half an hour late today.

658 01:25:12.060 --> 01:25:15.390 K. E. Bradley Law: Yes, Sir, but I'm going to have you out here I'm happy for four-hour sir I mean I--

659 01:25:16.410 --> 01:25:24.720 K. E. Bradley Law: Have half up to two I'm not saying I'm going to take an additional four hours I'm saying 10 minutes I'm just looking for one other thing.

660 01:25:24.810 --> 01:25:26.070 Chris Bacon: I know, but you've wasted.

661 01:25:26.100 --> 01:25:32.520 Chris Bacon: 15 minutes yester-- on Tuesday, because you want to delay deposition today you delayed 30 minutes.

662 01:25:32.790 --> 01:25:34.590 Chris Bacon: My client is getting billed.

663 01:25:34.650 --> 01:25:44.310 Chris Bacon: For 45 minutes of stuff of time because you were late, so I hope, tomorrow, we started in time at 10 o'clock If not, we will leave.

664 01:25:44.940 --> 01:25:55.260 K. E. Bradley Law: Sir, all I'm saying is we have four hours booked, and I'm not asking to extend you will be cut, you will be done in 10 minutes but.

665 01:25:55.260 --> 01:26:04.020 Chris Bacon: Alright, we'll take the five-minute break but I'm just saying when a deposition says 10 o'clock it should start at 10 o'clock you've been late on two depositions already.

666 01:26:04.020 -- > 01:26:04.890 K. E. Bradley Law: Yes sir.

667 01:26:04.890 --> 01:26:07.680 Chris Bacon: I will see--

668 01:26:07.890 --> 01:26:13.920 Chris Bacon: If we have that happen again, I will seek your attorney's fees for the time we spent waiting on all three depositions.

669 01:26:14.340 --> 01:26:20.550 K. E. Bradley Law: Yes, Sir, yes, Sir, and that's-- I understand I understand your remark all I'm saying is that we had the time booked in.

670 01:26:20.550 -- > 01:26:20.820 Chris Bacon: Let's take the 5 minute--

671 01:26:20.820 --> 01:26:22.770 K. E. Bradley Law: -- you out of here early everyday— (speaking over one another)

672 01:26:23.940 --> 01:26:24.210 (mario)Legally Under Oath: All right.

673 01:26:25.380 --> 01:26:26.880 (mario)Legally Under Oath: the time is 12:06 we're off the record.

674 01:26:28.710 --> 01:26:31.020 (mario)Legally Under Oath: The time is 12:14 we're back on the record.

675 01:26:36.600 --> 01:26:39.690 K. E. Bradley Law: Last couple questions, I just wanted to just follow up on Ms. Lopez.

676 01:26:41.970 --> 01:26:44.460 K. E. Bradley Law: At any point did you.

677 01:26:45.600 --> 01:26:53.340 K. E. Bradley Law: Did you receive any specific complaints in reference to Courtney Paulding or Anna Martinez from Ms. Baker.

678 01:26:54.600 --> 01:26:55.860 K. E. Bradley Law: Prior to January 3.

679 01:26:57.480 --> 01:26:58.650 Sonia Lopez - Lonestar Legal Aid: Not that I recall no sir.

EXHIBIT B

PAUL E. FURRH, JR.
Attorney at Law
Chief Executive Officer

ERNEST W. BROWN, JR.
Attorney at Law
Deputy Director



Lone Star Legal Aid
ADMINISTRATIVE OFFICE
Houston, Texas

September 27, 2018

Mailing Address:
1415 Fannin Street
Houston, Texas 77002

713-652-0077 Telephone
713-652-2709 Fax
800-733-8394 Toll-free

Via email

Ms. Chloe Baker

Re: Notice of Non-renewal of Temporary Worker Agreement

Dear Ms. Baker,

Please be advised that LSLA will not extend your Temporary Worker Agreement which ends on September 30, 2018. To that end, we are enclosing a Personnel Action Form memorializing the termination. Please sign, date and return to us.

Further, we are enclosing a ninety (90) day Personnel Action Form and Temporary Worker Agreement providing you with a Paralegal II position from October 1, 2018 through December 31, 2018.

Please review, sign, and date all three documents, and return to Pamela Sotoodeh via email psotoodeh@lonestarlegal.org.

I would also appreciate it if you will send all originals to her at the following address:

Pamela Sotoodeh
Director of Administration
Lone Star Legal Aid
P.O. Box 398
Houston, Texas 77001-0398

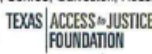
Thank you for your cooperation.

Sincerely,

ERNEST W. BROWN, JR.
Deputy Director

EWB/ps

Serving the East Region of Texas since 1948
Angleton, Beaumont, Belton, Bryan, Conroe, Galveston, Houston, Longview, Nacogdoches, Paris, Texarkana, Tyler, Waco



LON0043

The Honorable Christina A. Bryan

EXHIBIT B



DEPARTMENT OF VETERANS AFFAIRS

September 25, 2022

Chloe Marie Baker

In Reply Refer to:

27/eBenefits

Dear Ms. Baker:

This letter is a summary of benefits you currently receive from the Department of Veterans Affairs (VA). We are providing this letter to disabled Veterans to use in applying for benefits such as state or local property or vehicle tax relief, civil service preference, to obtain housing entitlements, free or reduced state park annual memberships, or any other program or entitlement in which verification of VA benefits is required. Please safeguard this important document. This letter is considered an official record of your VA entitlement.

Our records contain the following information:

Personal Claim Information

Your VA claim number is: xxx-xx

You are the Veteran.

Military Information

Your most recent, verified periods of service (up to three) include:

Branch of Service	Character of Service	Entered Active Duty	Released/Discharged
Air Force	Honorable	May 12, 2015	September 15, 2015
Air Force	Honorable	May 20, 2016	August 24, 2016

(There may be additional periods of service not listed above.)

VA Benefit Information

You have one or more service-connected disabilities:

Yes

Your combined service-connected evaluation is:

60%

You should contact your state or local office of Veterans' affairs for information on any tax, license, or fee-related benefits for which you may be eligible. State offices of Veterans' affairs are available at

<http://www.va.gov/statedva.htm>.

How You Can Contact Us

- If you need general information about benefits and eligibility, please visit us at <https://www.ebenefits.va.gov> or <http://www.va.gov>.
- Call us at 1-800-827-1000. If you use a Telecommunications Device for the Deaf (TDD), the number is 1-800-829-4833.
- Ask a question on the Internet at <https://www.va.gov/contact-us>.

Sincerely Yours,

Regional Office Director

